

PORZIO, BROMBERG & NEWMAN, P.C.

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Attorneys for the Debtor and Debtor-in-Possession

**UNITED STATE BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

20 BAYARD VIEWS, LLC,

Debtor.

Case No. 09-50723 (ESS)

Hon. Elizabeth S. Stong

Chapter 11

**NOTICE OF MOTION BY 20 BAYARD VIEWS, LLC: (1) OBJECTING TO AND
REQUESTING REDUCTION OF W FINANCIAL FUND, LP'S PROOF OF CLAIM;
AND (2) SEEKING TO REQUIRE W FINANCIAL FUND, LP TO DETAIL ITS
FEES/COSTS/CHARGES AND ESCROW FUND**

PLEASE TAKE NOTICE that a hearing (the "**Hearing**") will be held before the Honorable Elizabeth S. Stong, United States Bankruptcy Judge, on May 28, 2010 at 11:00 a.m., or as soon thereafter as counsel may be heard, in Courtroom 3585, United States Bankruptcy Court for the Eastern District of New York, 271 Cadman Plaza East, Brooklyn, New York 11201, to consider the motion (the "**Motion**") of the debtor and debtor in possession in the above-captioned case (the "**Debtor**"): (1) objecting to and requesting reduction of the proof of claim [Claim Number 11] of W. Financial Fund, L.P. ("**WFF**"); and (2) seeking to require WFF to detail its fees/costs/charges and escrow funds.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

PLEASE TAKE FURTHER NOTICE that the Hearing may be continued or adjourned from time to time without further notice other than an announcement of the adjourned date or dates at the Hearing or at a later hearing.

PLEASE TAKE FURTHER NOTICE that any response to the Motion must be made in writing, state with particularity the grounds therefore, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically (with a hard-copy delivered directly to Chambers), and must be served upon the undersigned (Attn: John S. Mairo, Esq.), together with proof of service thereof, so as to be received no later than 4:00 p.m. Eastern Standard Time on Thursday, May 20, 2010 (the "**Response Deadline**").

PLEASE TAKE FURTHER NOTICE that unless responses are received by Response Deadline, the relief may be granted as requested in the Motion.

Dated: Morristown, New Jersey
April 19, 2010

PORZIO, BROMBERG & NEWMAN, P.C.

By: /s/ John S. Mairo
John S. Mairo (JM-0670)

Attorneys for the Debtor and Debtor-in-Possession